

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

VISIBLE SYSTEMS CORPORATION,

Plaintiff

v.

UNISYS CORPORATION,

Defendant

Civil Action No. 04-CV-11610-RGS

**DEFENDANT'S RESPONSE TO PLAINTIFF'S DESIGNATIONS
OF RULE 30(b)(6) DEPOSITION TESTIMONY OF DAVID WRIGHT,
AND DEFENDANT'S COUNTER-DESIGNATIONS**

Plaintiff's Designations with Defendant's Response

Designation Page:Line	Defendant's Response
7:21-8:10	No objection
8:18-10:15	No objection
36:23-43:5	Objection, irrelevant. Concerns collateral use of the word "visible" other than in the trademark in dispute in this case, including use solely within Unisys, and Unisys legal and strategic decisions during and in response to this litigation
44:24-46:19	Same objection
69:21-71:15	Same objection
74:22-75:10	No objection
81:12-83:24	Objection, irrelevant. Immaterial matters concerning identities of Unisys employees dealing with analyst firm Gartner
85:19-90:18	See first objection above
94:24-97:11	Objection, lack of foundation, argument of counsel, hypothetical and misleading questions

Defendant's Counter-Designations

Designation Page:Line
6:18-21
11:3-7
11:16-12:23
13:5-15
15:4-21
50:17-51:2
56:1-24
58:8-59:14
60:7-19
60:23-61:6
61:11-15

Reserved Pending Ruling on Objections

Designation Page:Line
21:7-22:1
30:15-36:20

Dated: July 13, 2007

UNISYS CORPORATION,
By Its Attorneys,

/s/ William L. Boesch
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CERTIFICATE OF SERVICE

I hereby certify that this document is being filed through the ECF system, and that I am therefore relying on the system to complete service by sending copies of the filing electronically to the necessary counsel, who are registered participants.

/s/ William L. Boesch